

# **RAC “HOT” ITEMS**

**Exhibit 180**



Division of Plan Oversight & Accountability  
Part D RAC Weekly Updates  
June 8, 2015

**RAC “HOT” ITEMS:**

- ACLR submitted its rebuttal to the CPARS on 6/4/15.
- OAGM forwarded the SOW to OGC on 6/3/15. OGC is currently reviewing the SOW for final comments. OAGM also forwarded the technical criteria comments to CPI on 6/4/15. CPI is currently reviewing.
- The Duplicate Payment termination announcement letter was sent to plan sponsors on 6/4/15.
- OAGM decided not to move forward with the Termination for Convenience (T4C). Instead OAGM is determining if a formal response is also needed in addition to the TDL that was provided.
- OAGM provided a response to ACLR’s claim on 6/5/15. The original claim was submitted March 12, 2015.

**THIS WEEK’S MEETINGS:**

- 6/2/15: Schedule Drug Refill Level 1 Appeals Discussion: This was an internal meeting to discuss SHS request to extend the appeal review period and the administrative error concerns.
- 6/3/15: Part D RAC Update: This was an internal meeting to discuss the Part D RAC activities and statuses.

**DISCUSSION ITEMS:**

○ **New Issues:**

○ **Scheduled Drug Refill Errors(Non-LTC):**

- Appeal Results:
  - 2010: 43 out of 67 contracts appealed
  - 2011: 58 out of 74 contracts appealed
- SHS sent an email on 5/29/15 requesting until the end of July to complete the level 1 Appeals.

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- DPOA requested that SHS try to complete the appeal review within the 90 day review period.
  - The appeal package for CVS Health Corporation (S5601) arrived at SHS on 6/4/15.
  - SHS provided a memorandum outlining their concerns with identifying the potential administrative errors as improper refills.
    - DPOA reviewed the memo and requested that SHS remain independent when determining the appeal decision.
  - **Duplicate Payment:**
    - The Duplicate Payment Termination Letter was sent to plan sponsors on 6/4/15.
      - SHS received undeliverable messages from four plans.
        - At least one contact from H2320, H4875, H5590, and S5857 received the termination memo, and no contact from H5932 received the memo.
        - OAGM decided not to proceed with the Duplicate Payment termination for convenience.
          - OAGM is determining if a formal response is needed in addition to the previously submitted TDL.
      - The Duplicate Payment PRIS notification has been disabled until further notice.
    - **Scheduled Drug Refill Errors (Non LTC) CY 2012- 2013:**
      - After ACLR has reconciled the PY13 PDE data, they will submit the Schedule Drug Refill Error audit issue.
    - **Deceased Prescriber Study 8/2013 -12/2013**
      - The DVC was tasked with a deceased prescriber study using PDE data from 8/2013 -12/2013 and using PECOS (8/2012-12/2012) to identify prescribers that have been deceased for at least one year.
    - **Security Updates:**

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- Livanta received the PY13 PDE data from OTS on 6/5/15.
  - **PRIS Update:**
    - PRIS Release 3 may be on hold due to the ECM contract expiration in September.
      - PRIS DUA has been extended until 6/04/16.
    - One third testing for the Livanta MRIC connection to the PRIS application is scheduled for 06/08/2015.
    - APPS-PRIS Integration testing in Validation for the Offset process will take place in beginning 6/16/2015. A later date will be set to test the Credit process once CAS Severn has been tasked officially with an updated SOW.
      - OTS has uploaded the PRIS package in CAMS on 6/4/15. MPPG has also stated that until we have a credit piece they are willing to work with us to get any additional Credits processed after integration go live date of August 01, 2015.
  - **OIG/GAO Update:**
    - None
  - **Other:**
    - Rainmaker's was tasked with updating the Medicare Parts C and D RAC website and has provided their recommendations.
      - DPOA has reviewed the mock up documents and have provided comments.

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